

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
V.	§	NO. 4:17-CR-431
	§	
STEPHEN LYNCH	§	

**DEFENDANT’S UNOPPOSED MOTION
TO CONTINUE PRETRIAL CONFERENCE AND TRIAL**

TO THE HONORABLE NANCY ATLAS:

NOW COMES, STEPHEN LYNCH, Defendant, by and through his attorney, Charles Flood, and files this Unopposed Motion to Continue Pretrial Conference and Trial, saying for cause as follows:

1. Pursuant to this Court’s Orders (D.E. 30 and 33) Pre-Trial Conference is set April 2, 2018 and Jury Selection and Trial is set April 16, 2018.
2. Counsel for Defendant and the government are actively discussing resolution of this matter without the need for a trial. Defendant requests additional time for the parties to finalize the plea agreement.
3. Counsel for Defendant is currently in trial in Case No. 4-17-CR-00116, *United States v. Stephen Stockman*, before The Honorable Lee Rosenthal. This trial is expected to last into the proposed trial date of this matter.
4. Attorney for the government Kimberly Leo is unopposed to this motion.

5. This motion is not made for purposes of delay but solely to ensure the fair administration of justice. Granting of this continuance outweighs the best interests of the public and the defendant in a speedy trial.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this Court grant this motion and issue a new scheduling order.

Respectfully submitted,

/s/ Charles Flood
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Assistant U.S. Attorney Kim Leo who is unopposed to this request.

/s/ Charles Flood
Charles Flood

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2018, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Charles Flood

Charles Flood